## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF INDIANA HAMMOND DIVISION

GLITCH PRODUCTIONS PTY LTD,

Plaintiffs,

Case No. 25-cv-00161

v.

THE PARTNERSHIPS and UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE "A,"

Defendants.

## PLAINTIFF'S MOTION FOR LEAVE TO FILE CERTAIN DOCUMENTS UNDER SEAL

Plaintiff Glitch Productions Pty Ltd ("Plaintiff") respectfully requests, pursuant to N.D. Ind. L.R. 5.3(c)(1), leave to file the following under seal: (1) Schedule A to the Complaint, which lists the Defendants by their Seller Aliases; and (2) Exhibit 2 to the Declaration of Stewart Miller, which will be filed in support of Plaintiff's forthcoming motion for entry of a temporary restraining order, which includes screenshots showing the e-commerce stores operating under the Seller Aliases.

In this action, Plaintiff is requesting *ex parte* relief based on an action for trademark infringement and counterfeiting, and false designation of origin. Sealing this portion of the file is necessary to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence and the hiding or transferring of assets to foreign jurisdictions, thus frustrating the purpose of the underlying litigation and this Court's power to grant relief. Once the temporary restraining order has been

served on the relevant parties and the requested actions are taken, Plaintiff will move to unseal these documents.

Dated this 7<sup>th</sup> day of April 2025.

Respectfully submitted,

/s/ Martin F. Trainor

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